IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
vs.) Case No. 08 CV 3160
EGAN MARINE, INC., in personam, MOTOR VESSEL LISA E, in rem, and TANK BARGE) Judge Coar
EMC-423, in rem,) Magistrate Judge Cox
Defendants.)

NOTICE OF MOTION

PLEASE TAKE NOTICE that on August 5, 2008, at 9:00 a.m., the undersigned shall appear before the Honorable David H. Coar, in the room usually occupied by him, Room 1419, in the United States District Court for the Northern District of Illinois, Eastern Division, 219 South Dearborn Street, Chicago, Illinois, and shall then and there present **Swanson**, **Martin & Bell**, **LLP's Motion to Withdraw and for Additional Time to Answer or Otherwise Plead**, a copy of which is attached herein.

Respectfully submitted,

By: s /John P. Arranz
One of the Attorneys for Defendants

Dated: July 31, 2008

Michael J. Maher (6191018) John P. Arranz (6280810) SWANSON, MARTIN & BELL, LLP 330 North Wabash Avenue Suite 3300 Chicago, Illinois 60611 (312) 321-9100

CERTIFICATE OF SERVICE

The undersigned, an attorney, states that a true and complete copy of the foregoing **NOTICE OF EMERGENCY MOTION** was served upon the following parties via operation of the Northern District of Illinois Electronic Filing System on this 31st day of July 2008:

Stephen R. Campbell Senior Trial Counsel Torts Branch, Civil Division U.S. Department of Justice P.O. Box 14271 Ben Franklin Station Washington, DC 20044-4271 (202) 616-4026

Jennifer Curtin Timm ARDC: 6229091 Attorney for Defendants Egan Marine Corporation 15200 East Canal Bank Road P.O. Box 669 Lemont, Illinois 60439 (630) 739-0947 Fax: (630) 739-4455

1 un. (050) 155 1155

/s/ John P. Arranz